

REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Amendments to Claims

Claim 1 has been amended to clarify that the location updating is requested as the mobile communication device moves from a cell corresponding to the location area to an island cell corresponding to an island location area which is different from the location area.

Support for the amendment is provided by Figs. 3 and 4, and the corresponding description in lines 14-23 on page 11 of the original specification. Accordingly, the amendments do not involve “new matter.”

2. Rejection of Claims 1, 2, 4-9, and 11-14 Under 35 USC §103(a) in view of U.S. Patent Publication No. 2002/0151307 (Demarez) and Admitted Prior Art, and Rejection of Claims 3 and 10 Under 35 USC §103(a) in view of the Demarez Publication, Admitted Prior Art, and U.S. Patent Publication No. 2004/0121818 (Paakkonen)

This rejection is again respectfully traversed on the grounds that the Demarez publication neither discloses nor suggests an island type mobile communication arrangement which makes it possible to obtain MSISDNs of all cellular phones in island cells, in order to provide a special message service without increasing the load on the mobile communication arrangement, by:

- providing an island cell in a location area having a plurality of cells, and
- making the island cell correspond not to the location area but to an island location area which is *different* from the location area.

As a result of the claimed arrangement, although the island cell is physically located in the location area, a mobile communication device moving from a cell (in the location area) into the island cell (still in the same location area but corresponding to a different island location area) will initiate a location updating with which a special message service can be provided without increasing the load.

Neither the Demarez publication nor the Paakkonen publication discloses such an island cell that corresponds to an island location area, which is different from the location area where the island cell is located. In the Demarez and Paakkonen publications, the cells that form a location area all correspond to the same location area. There is no different location area where the island cell is located.

The Demarz publication actually states in paragraph [0011] that “in case an MS moves from a cell within a RA into a cell that belongs to another Routing Area, it will perform a Routing Area Update procedure towards the SGSN, hence the SGSN will get informed of the MS’s new location, and modify the paging request accordingly. If the new RA belongs to a different LA, the MS will also perform a Location Update procedure towards the VLR,...”, which is clearly different from the present invention in which location updating is performed even when a mobile communication device moves from a cell to an adjacent island cell located in the same location area (LA). The Paakkonen publication is cited solely for its disclosure of multi-media messaging, and does not disclose any sort of procedure involving location updating when moving from a cell corresponding to a location area into an island cell corresponding to an island location which is different from the location area.

Therefore, for at least these reasons, it is respectfully submitted that the Demarez and Paakkonen publications, whether considered individually or in any reasonable combination, fail to provide a *prima facie* basis for concluding that claims 1-14 of the present application are obvious in view of either or both references. Accordingly, it is respectfully submitted that claims 1-14 are allowable over the art of record, and withdrawal of the rejections of claims 1-14 under 35 USC §103(a) is requested.

Having thus overcome each of the rejections made in the Official Action, expedited passage of the application to issue is requested.

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Respectfully submitted,

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